

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA**

IN RE:] **CHAPTER 11**
] **CASE NO: 15-30116-SDB**
MULLIS GARAGE & AUTO PARTS, LLC,]
DEBTOR.]

**MOTION FOR EXPEDITED HEARING ON DEBTOR'S MOTION FOR ENTRY OF AN
ORDER (I) AUTHORIZING THE DEBTOR TO OBTAIN POSTPETITION
FINANCING PURSUANT TO 11 U.S.C. §§ 105, 361, 362, 364(b), AND
GRANTING RELATED RELIEF**

COMES NOW the Debtor who shows this Court the following:

1.

The Debtor as Debtor-In-Possession has filed a Motion for Entry of an Order (I) Authorizing the Debtor to Obtain Post-Petition Financing Pursuant to 11 U.S.C. §§105, 361, 362 364(b), and (II) Granting Related Relief to authorize it to obtain post-petition financing pursuant to the terms and conditions of a Loan Agreement.

2.

The nature of the Motion requires expedited in hearing inasmuch as the Debtor needs a capital infusion to assist with the operation and maintenance of the business.

3.

The Court has authority to set hearings on an expedited basis upon separate Motion and Certificate of Necessity.

WHEREFORE, the Debtor respectfully prays that this Court:

a.) expedite the hearing on the Debtor's Motion for Entry of an Order (I) Authorizing the Debtor to Obtain PostPetition Financing Pursuant to 11 U.S.C. §§105, 361, 362, 364(b) and (II) Granting Related Relief within five days from the date of approval of this Motion or such other time

as the Court deems appropriate under the circumstances; and

b.) grant the Debtor any and all further relief as is just.

SO MOVED this 1st day of May 2015.

MERRILL & STONE, LLC

s/Jon A. Levis

JON A. LEVIS
ATTORNEY FOR DEBTOR
GEORGIA BAR NO: 448848

LAW OFFICES:

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CERTIFICATE OF NEED

THE UNDERSIGNED certifies that the Debtor's estate could suffer immediate and irreparable harm unless an expedited hearing is held to consider the Debtor's Motion of the Debtor for Order Authorizing the Debtor to Pay Prepetition Taxes inasmuch as the Debtor needs a capital infusion to assist with the operation and maintenance of the business.

THIS 1st day of May, 2015.

MERRILL & STONE, LLC

s/Jon A. Levis

**JON A. LEVIS
ATTORNEY FOR DEBTOR
GEORGIA BAR NO: 448848**

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EMANUEL COUNTY, GEORGIA

CERTIFICATE OF SERVICE

I, Jon A. Levis, of the firm of Merrill & Stone, Attorneys at Law, Post Office Box 129, Swainsboro, Georgia 30401, do hereby certify that I have served a copy of the within foregoing

MOTION FOR EXPEDITED HEARING ON DEBTOR'S MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTOR TO OBTAIN POSTPETITION FINANCING PURSUANT TO 11 U.S.C. §§105, 361, 362, 364(b) AND (II) GRANTING RELATED RELIEF, CERTIFICATE OF NEED, ORDER ON MOTION FOR EXPEDITED HEARING ON APPLICATION FOR HEARING

to:

Matthew E. Mills, Esq. Office of the U.S. Trustee Johnson Square Business Center 2 East Bryan Street, Suite 725 Savannah, GA 31401	Joshua E. Kight, Esq. Attorney At Law Post Office Box 816 Dublin, GA 31040
Edward B. Claxton, III, Esq. Edward B. Claxton, III, LLC Post Office Box 16459 Dublin, GA 31040	Mr. Lucas Cowart Morris State Bank Post Office Box 520 Dublin, GA 31040

by email and/or mailing a copy through the United States mail with sufficient postage attached thereto to assure delivery.

THIS the 1st day of May, 2015.

MERRILL & STONE, LLC

s/Jon A. Levis

**JON A. LEVIS, ESQ.
ATTORNEY FOR DEBTOR
GEORGIA BAR NO: 448848**

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